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RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN THE MATTER OF THE TAX
LIABILITIES OF:

CV 11 1686
Case No. LB

JOHN DOES, United States taxpayers, who)
at any time during the years ended December)
31, 2002 through December 31, 2010,)
directly or indirectly had interests in or)
signature or other authority (including)
authority to withdraw funds; trade or give)
instructions or receive account statements,)
confirmations, or other information, advice)
or solicitations) with respect to any financial)
accounts maintained at, monitored by, or)
managed through The Hongkong and)
Shanghai Banking Corporation Limited in)
India (HSBC India).)


[PROPOSED] ORDER
GRANTING *EX PARTE*
PETITION FOR LEAVE TO
SERVE "JOHN DOE" SUMMONS

THIS MATTER is before the Court upon the United States of America's "*Ex Parte*
Petition for Leave to Serve John Doe Summons." Based upon a review of the Petition and exhibits
thereto, the Court has determined that the "John Doe" summons to HSBC Bank USA, N.A. relates

1 to the investigation of an ascertainable group or class of persons, that there is a reasonable basis for
2 believing that such group or class of persons may fail or may have failed to comply with any
3 provision of any internal revenue law, and that the information sought to be obtained from the
4 examination of the records or testimony (and the identities of the persons with respect to whose
5 liability the summons is issued) are not readily available from other sources. It is therefore—

7 ORDERED AND ADJUDGED that the Internal Revenue Service, through Revenue Agent
8 Daniel Reeves or any other authorized officer or agent, may serve an Internal Revenue Service “John
9 Doe” summons upon HSBC Bank USA, N.A. in substantially the form as attached as Exhibit A to
10 the Declaration of Daniel Reeves. A copy of this Order shall be served together with the summons.
11

12 DONE AND ORDERED this 7 day of April, 2011.

13
14
15 
UNITED STATES DISTRICT JUDGE

16 Copies furnished to:

17 Stuart D. Gibson
18 Senior Litigation Counsel
19 Tax Division
20 U.S. Department of Justice
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22 Washington, DC 20044

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26 Philip Burton United States Courthouse
27 450 Golden Gate Avenue
28 San Francisco, CA 94102

Phyllis J. Hamilton
United States District Judge